

CITY OF CONCORD

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

May 19, 1993

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FCC MAIL ROOM

Ms. Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street N.W. - Room 222  
Washington, DC 20554

RE: PR DOCKET NO. 92-235

Dear Ms. Searcy:

In the matter of the revision of the **Private Land Mobile Radio (PLMR) Services** and the modification of the policies governing those services (PR Docket No. 92-235, the replacement of Part 90 by Part 88), we have the following comments:

1. **WE DISAGREE WITH PR DOCKET 92-235 AS IT IS CURRENTLY PROPOSED.**
2. The fire, law enforcement, and ambulance agencies of Contra Costa County serve a population of over 850,000. **The equipment costs alone to meet the proposed requirements of PR Docket 92-235 are estimated at over FOURTEEN (14) MILLION DOLLARS.** This estimate is based on the 108 base stations and 1,737 mobile and portable radios in the county's largest police, fire, and public works affected agencies. **County and city governments** are experiencing severe budget cutbacks, including layoffs, and simply will not be able to meet the mandate as proposed.
3. In effect, PR Docket 92-235 is a locally mandated program; therefore, we believe that **the federal government should provide a changeover funding source**, such as seed funding through block grants for local government agencies.
4. **The current licensee should remain the licensee** for the narrowband channels which will be split out of the wideboard channel, **up to the year 2005**, which will be ten years from adoption of the FCC regulations. This will give local governments the time required to make such a tremendous changeover in equipment which the new narrowband channels will require.

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5. We disagree that the frequency coordinating agencies would manage their proposed major role in administering channel